

**STATE OF MICHIGAN  
IN THE 10<sup>TH</sup> JUDICIAL CIRCUIT COURT-FAMILY DIVISION  
SAGINAW COUNTY**

MELISSA JAYNE CALICE,

Plaintiff,

VS.

File No. 12-017215-DZ-1

RICHARD ANTHONY CALICE, JR.,

HON. FRED L. BORCHARD

Defendant.

\_\_\_\_\_/

BURKHART, PICARD,  
TIDERINGTON & McLEOD, PLLC  
BY: TIMOTHY R. McLEOD (P29880)  
Attorneys for Plaintiff  
820 N. Michigan Avenue  
P.O. Box 6055  
Saginaw, Michigan 48608  
(989) 753-4441

DEMETRIOU & ASSOCIATES, P.C.  
BY: THOMAS J. DEMETRIOU (P12663)  
Attorneys for Defendant  
3262 Cabaret Trail, Suite 206  
Saginaw, Michigan 48603  
(989) 793-6440

\_\_\_\_\_ /

**DEFENDANT'S MOTION FOR PARENTING TIME**

NOW COMES, the Defendant, RICHARD ANTHONY CALICE, by and through his attorneys, DEMETRIOU & ASSOCIATES, P.C., by THOMAS J. DEMETRIOU, and for his motion states as follows:

1. An action for divorce is currently pending.
2. Two children were born as a result of the marriage, to-wit: Rocco Jefferson Calice, born 10/27/2006, and Amelia (Mia) Jayne Calice, born 04/25/2008.
3. On or about February 11, 2013, Jill Hogenson issued a report and recommendation relating to custody and parenting time. Both parties have objected to Ms. Hogenson's report and recommendation.

4. Trial in this matter is not scheduled until November 5, 2013.
5. The Defendant would like to have parenting time with the minor children as follows:
  - A. October 24, 2013 to October 27, 2013. The children would depart from Flint, MI to Baltimore, MD at 6:50 p.m. on October 24<sup>th</sup> and return to Flint, MI at 12:05 p.m. on October 27<sup>th</sup>. Plaintiff would be responsible to get the children to and from the airport.
  - B. For Thanksgiving, the Defendant would pick up the children at noon on their last day of school before the Thanksgiving break which is November 25, 2013, and would return them to the Plaintiff on Sunday, December 1, 2013, at 5:00 p.m.
  - C. For Christmas, the Defendant would pick up the children on their last day of school before the Christmas break on December 20, 2013, and shall return them to the Plaintiff on January 5, 2014.
  - D. January 17, 2014 through January 20, 2014. The children would depart from Flint, MI to Baltimore, MD at 5:05 p.m. on January 17<sup>th</sup> and return to Flint, MI at 11:45 p.m. on January 20<sup>th</sup>. Plaintiff would be responsible to get the children to and from the airport.
6. Defendant would request that Plaintiff be responsible for ½ of the transportation costs for the Defendant's parenting time.

WHEREFORE, the Defendant respectfully requests that this court enter an order granting the Defendant the parenting time requested herein and require the Plaintiff to pay ½ of the travel costs and to transport the children to and from the airport and to grant such other and further relief as shall be just and equitable under the circumstances.

DATED: September 5, 2013 DEMETRIOU & ASSOCIATES, P.C.

  
BY: THOMAS J. DEMETRIOU  
Attorneys for Defendant

**STATE OF MICHIGAN  
IN THE 10<sup>TH</sup> JUDICIAL CIRCUIT COURT-FAMILY DIVISION  
SAGINAW COUNTY**

MELISSA JAYNE CALICE,

Plaintiff,

VS.

File No. 12-017215-DZ-1

RICHARD ANTHONY CALICE, JR.,

HON. FRED L. BORCHARD

Defendant.

---

BURKHART, PICARD,  
TIDERINGTON & McLEOD, PLLC  
BY: TIMOTHY R. McLEOD (P29880)  
Attorneys for Plaintiff  
820 N. Michigan Avenue  
P.O. Box 6055  
Saginaw, Michigan 48608  
(989) 753-4441

DEMETRIOU & ASSOCIATES, P.C.  
BY: THOMAS J. DEMETRIOU (P12663)  
Attorneys for Defendant  
3262 Cabaret Trail, Suite 206  
Saginaw, Michigan 48603  
(989) 793-6440

---


**NOTICE OF HEARING**

TO: Clerk of the Circuit Court  
Friend of the Court  
Timothy R. McLeod, Attorney

**PLEASE TAKE NOTICE** that the matter of Defendant's Motion for Parenting Time shall come on to be heard in the Circuit Court, Saginaw County Courthouse, Saginaw, Michigan, before the Honorable Fred L. Borchard, on **September 30, 2013, at 2:30 p.m.** or as soon thereafter as counsel may be heard.

DATED: September 5, 2013

DEMETRIOU & ASSOCIATES, P.C.

  
BY: THOMAS J. DEMETRIOU  
Attorneys for Defendant